## Dear Melissa,

Thank you for the opportunity to offer comments on the closure distance off the Southeast Farallon Islands. We have been very fortunate to be able to lead natural history trips to the Farallones for close to 25 years (Carol) and 18 years (Doreen) and to have educated thousands of members of the general public on the unique characteristics of the Farallones and their importance to the central California marine ecosystem. The primary focus of these trips has been to connect people to the amazing wildlife on and near the Farallones. On the occasional days when no whales are seen, people commonly state that they were thrilled to just see the islands and associated wildlife.

One of the threats to Farallon seabirds and pinnipeds is from human disturbance caused by vessels that approach too closely or at high speeds. Protection of this important area from these types of disturbances is critical, especially during breeding seasons. We completely understand and agree that regulating the distance is all about protecting the wildlife.

On the other hand, these trips are all about getting people connected to the amazing natural world we are so fortunate to have off San Francisco. To really get a better view of the seabirds and pinnipeds, binoculars are required, even at 300 feet, and in our opinion, this distance has worked very well. This limit has been in place for many decades and has been followed by countless wildlife viewing expeditions. These trips foster a deep appreciation for nature and a connection to nature that leads to caring, conservation, stewardship, and environmentally responsible behavior.

Expanding the approach distance will significantly affect the public's experience in making these important connections, especially at time in human history when the general public, overall, is spending less time outside exploring and learning about the natural world and making important connections to nature. If the approach distance is expanded, even with binoculars, the public will not be able to view the magnificent wildlife. For example, we have an incredible teaching opportunity to show passengers threatened Steller sea lions or depleted northern fur seals. Both species have been impacted by human disturbance in the past. However in the case of the fur seals, now protected on the Farallones, their population has rebounded.

However, allowing the public off-island access under strict approach guidelines such as number of vessels near the islands and amount of time spent there during sensitive breeding periods would go a long way to create disturbance free zones. Over the years I (Carol) have seen some disturbance events where boaters who either don't care, or don't know, have disturbed both seabirds and pinnipeds on the islands. According to the on-line comments from the Farallones National Wildlife Refuge there has been a decline in the incidents of boats flushing seabirds and pinnipeds. In 1989-1990 there were 13 incidents of boats flushing seabirds and pinnipeds, whereas between 2003 and 2007, one to four boat-caused flushing events were documented. By showing the public the benefits of observing wildlife from safe distances, they become educated about the impacts of human disturbance.

In summary, in order to perpetuate opportunities for high quality wildlife viewing, we support the current area closures (300') around the entire Southeast Farallon Islands. Both of us have worked as contract naturalists for several organizations including: SF Bay Whalewatching, Farallones Marine

Sanctuary Association, Seamen's Training Institute, Harbor Seal Company, and Oceanic Society. The captains we have worked with over the years (and currently work with) all approach with caution and have never caused disturbances.

Carol A. Keiper , Marine Biologist/Naturalist & Doreen Moser Gurrola, Naturalist